

Wisconsin State Telecommunications Association, Inc.

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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
244 12th Street SW
Washington, D.C. 20554

RE: In the Matter of Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92, Comments of Certain Members of the Wisconsin Telecommunications Association

Dear Ms. Dortch:

The members of the Wisconsin State Telecommunications Association (“WSTA”)¹ listed in Attachment 1 to this letter (the “Listed Companies”), file this letter as their Comments in the above-entitled docket.

The Listed Companies all agree that this docket will set the stage for the future of the telecommunications industry. As this industry enters a period of transition, the policies determined now will have far-reaching and long-lasting effects on the viability of the telecommunications network. At the outset of this docket, the Commission identified several key issues that will be crucial as the industry makes this transition.

The Listed Companies are, in general, smaller telecommunications companies that serve predominantly rural areas in Wisconsin. As this Commission is surely aware, rural companies play a significant role in ensuring that telecommunication services are affordable and accessible to everyone, particularly in higher cost areas. These rural companies rely heavily on intercarrier compensation and universal service funding to provide world-class telecommunication services throughout the state of Wisconsin.

¹ WSTA is a membership trade association which represents all of Wisconsin’s 83 local exchange carriers.

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Given the importance of intercarrier compensation and universal service funding, the Listed Companies believe the following principles must be seriously considered in this docket:

- That intercarrier compensation should be based the costs for transiting traffic, not at an arbitrary level of compensation that does not account for the actual cost of accessing the telephone network;
- That the Commission should not adopt a bill-and-keep regime for intercarrier compensation;
- That compensation rates should be established for both originating and terminating traffic, particularly where equal access requirements exist. In essence, the general rule should be: if you use the telephone network, compensation should be paid to the local exchange carrier for use of those facilities;
- That to ensure affordable accessibility to telecommunications, federal universal service mechanisms should be retained and further promoted, especially in rural, high-cost areas; and
- That universal service funding mechanisms be revised to include contributions from the broadest possible group of contributors, including newer technologies that benefit from wide-spread, affordable telephone networks.

Clearly, any decisions made in this docket will have far-reaching effects on the industry as a whole and will shape the direction of the industry's future. To ensure that the industry continues to promote true universal service, the Listed Companies believe that it is imperative for the Commission to devise a system of intercarrier compensation that is fair, technology neutral, and that continues to provide support to the telephone network throughout the country.

Sincerely,

/s/

William Esbeck
Executive Director

ATTACHMENT 1

Amherst Telephone Company
Baldwin Telecom, Inc.
Bayland Telephone, Inc.
Bloomer Telephone Company
CenturyTel
Chibardun Telephone Cooperative, Inc.
Clear Lake Telephone Company
Hager TeleCom, Inc.
Indianhead Telephone Company
LaValle Telephone Cooperative
Luck Telephone Company
Milltown Mutual Telephone Company
Niagara Telephone Company
Northeast Telephone Company, LLC
Richland-Grant Telephone Cooperative, Inc.
State Long Distance Telephone Company
TDS Telecom
Tri-County Telephone Cooperative, Inc.
Vernon Telephone Cooperative, Inc.
Wittenberg Telephone Company
Wood County Telephone Company